

REMARKS

In the Office action mailed on February 27, 2004, claims 1–42 stand rejected and the drawings are objected to. In particular, claim 1 is provisionally rejected for double patenting over U.S. Patent Application No. 09/703,502, claim 40 is objected to based on an informality, and claims 24 and 30 are rejected under 35 U.S.C. § 112. In addition, claims 1, 2, 14, 15, 20, 22, and 23 are rejected under 35 U.S.C. § 102(e) over U.S. Patent No. 6,336,124 to Alam et al (“*Alam*”), and claims 24, 25, 27, 28, 31–33, and 36–38 are rejected under 35 U.S.C. 102(e) over U.S. Patent No. 6,125,391 to Meltzer (“*Meltzer*”). Claims 19–21 are rejected under 35 U.S.C. 103(a) over *Alam*. Claims 29, 30 and 36 is rejected under 35 U.S.C. 103(a) over *Meltzer*. Claims 3–10, 12, 13, 16, 26, 34, 35, 39, and 40 are rejected as unpatentable under 35 U.S.C. 103(a) over *Alam* and *Meltzer*. Claim 11 is rejected as unpatentable under 35 U.S.C. 103(a) over *Alam* and U.S. Patent No. 5,278,678 to Harrington (“*Harrington*”). Lastly, claims 17, 18, 41, and 42 are rejected under 35 U.S.C. 103(a) over *Alam* and U.S. Patent No. 5,623,681 to Rivette et al. (“*Rivette*”).

The applicant traverses the rejections and objections, amends the drawings and the claims, and requests reconsideration of the claims based on the foregoing amendments and the following remarks. Support for the amendments to the claims can be found at least at page 5, lines 11–page 6, line 10 of the specification. Applicant asserts that no new matter has been added.

Applicant encloses herewith a terminal disclaimer in compliance with 37 CFR 1.321(c) signed by the attorney or agent of record for overcoming the double-patenting rejection, and the required fee under 37 CFR 1.20(d).

Applicant and the undersigned attorney thank Examiners Roswell and Cabella for their time and attention during the telephonic interview conducted with the undersigned on April 21, 2004.

Figures 1 and 3 and Amended Figure 2 are in Condition for Allowance

Figure 2 is amended to satisfy the Examiner's objections. The bounds of input module 11 are clearly delineated in amended Figure 2. The Office Action indicates that the bounds of system 8 are not clearly pointed out in Figure 3. The Applicants respectfully submits that system 8 is not intended to be depicted, nor was system 8 intended to be depicted in Figure 3 of the present application. Applicants therefore request that the objections to the drawings be withdrawn.

The Enclosed Terminal Disclaimer Obviates the Non-Statutory Double Patenting Rejection

As indicated above, Applicant encloses herewith a terminal disclaimer in compliance with 37 CFR 1.321(c). Therefore, Applicant respectfully requests withdrawal of the double patenting rejection.

Amended Claim 40 Satisfies the Examiner's Objection

Original claim 40 is objected to because of the use of the term "display." Claim 40 is amended to strike the words "includes a display". Applicants therefore submit that amended claim 40 is in condition for allowance.

Amended Claims 24 and 30 Comply With 35 U.S.C. § 112

Amended claims 24 and 30 comply with 35 U.S.C. § 112, second paragraph. In claim 24, the word "the" preceding "digital content" has been stricken. Claim 30 is amended to

depend upon claim 28, instead of claim 24. Claim 28 provides antecedent basis for “mapping”. Applicant therefore submits that claims 24 and 30 satisfy 35 U.S.C. § 112 and request that these rejections be withdrawn.

Amended Independent
Claims 1, 24, and 41 Are Patentable Over the Cited References

In broad overview, amended independent claims 1, 24, and 41 relate to systems and methods for processing the collective content of multiple input bytestreams, sources of data, and digital documents, respectively. In particular, Amended independent claim 1 recites in part:

a core document engine for a) converting said document objects into internal representation data representing the collective content of said input bytestreams in an internal representation data format and for b) mapping said internal representation data to a location on a display;

Amended independent claim 24 recites in part:

generating a collective content file representative of an internal representation of content to be presented to a user by processing the first data structures to determine a structure for a portion of the collective content file and by processing the second data structures to determine data content for the respective portion of the collective content file.

Amended independent claim 41 recites in part:

a plurality of document agents for converting content in the digital documents into a collective set of document objects representative of internal representations of primitive structures identified in the digital documents, and
a core document engine for rendering said collective set of document objects to generate a display representative of the collective digital content

None of the cited references, either individually, or in combination, describe the processing of multiple input bytestreams, sources of data, or digital documents to yield or further process the collective content, thereof. Applicant therefore submits that amended independent claims 1, 24, and 41 are patentable over the references. As dependent claims 2–15 and 17–23,

Application No.: 09/835,484

Docket No.: PGLD-P01-007

25–40, and 42 depend upon independent claims 1, 24, and 41, respectively, applicant respectfully submits that they are patentable as well.

CONCLUSION

Applicant submits that the above listed claims are in condition for allowance and requests that the application be passed on to allowance in due course.

Applicant believes that no fees are due in connection with filing of this response. If there are any fees due in connection with the filing of this response, please charge the fees to our Deposit Account No. 18-1945 under Order No. PGLD-P01-007 from which the undersigned is authorized to draw.

Dated: May 6, 2004

Respectfully submitted,

By 
Edward A. Gordon

Registration No.: 54,130
ROPES & GRAY LLP
One International Place
Boston, Massachusetts 02110-2624
(617) 951-7000
(617) 951-7050 (Fax)
Attorneys/Agents For Applicant

ANNOTATED SHEET SHOWING CHANGES



10

8

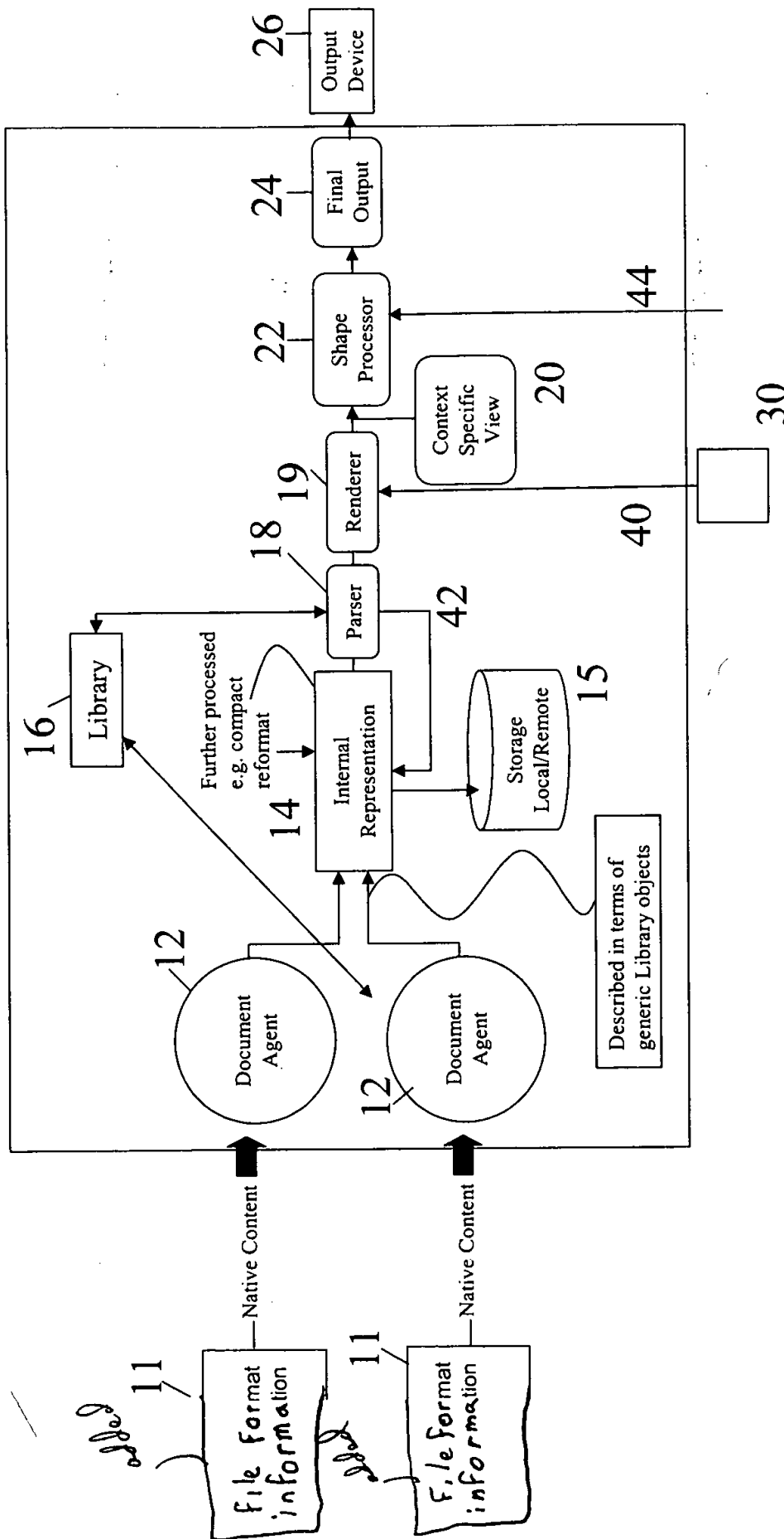


Figure 2